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BEFORE THE POSTAL RATE COMMISSION DEC 28 WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO RESPOND TO OFFICE OF THE CONSUMER ADVOCATE MOTION TO COMPEL PRODUCTION OF INFORMATION REQUESTED IN INTERROGATORY OCA/USPS-306(b) and (c) AND A RESPONSIVE ANSWER TO 306(d)

The United States Postal Service hereby moves for an extension of time to respond to Office of the Consumer Advocate Motion to Compel Production of Information Requested in Interrogatory OCA/USPS-306(b) and (c) and a Responsive Answer to 306(d). The OCA Motion was filed on December 26, 2001, making a response due on Wednesday, January 2, 2002. The Postal Service requests that it be granted an extension of one day – until Thursday, January 3, 2002 – to file its response. The extension is requested due to the holiday and the press of other business. Undersigned counsel contacted Ms. Dreifuss of the OCA, who graciously does not oppose this request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990; Fax –5402 December 28, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchel

Sen M. Ducke

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990; Fax –5402 December 28, 2001